

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on November 29, 2006.

Permit Number: **R30-00900012-2006**

Application Received: **June 26, 2008**

Plant Identification Number: **03-54-00900012**

Permittee: **Impress USA, Inc.**

Facility Name: **Weirton Plant**

Mailing Address: **3030 Birch Drive, Weirton, West Virginia 26062**

Permit Action Number: *MM01* Revised: *October 23, 2008*

Physical Location:	Weirton, Brooke County, West Virginia
UTM Coordinates:	531.834 km Easting • 4,470.823 km Northing • Zone 17
Directions:	Located at Half Moon Industrial Park – US Route 22 to Half Moon Road to Signode Road.

Facility Description

Impress USA's Weirton Plant (SIC Code 3411 and NAICS Code 332431) manufactures pet food cans. The Weirton Plant has four (4) coating lines with three thermal oxidation systems with heat recovery. The operating lines (Line Nos. 1 through 4) include the coating operation, drying operation, and the emission control. The equipment is fed uncoated sheets of metal, applies the coating, dries the coating, and restacks the sheets. The only difference with the lines is that Line No. 4 operates in line with the existing Litho Coating Line. The Litho Coating Line is a printer, which prints on the sheet metal prior to the coating being applied in the coating portion of the operation. The facility receives rolls of sheet metal, cuts the sheets, prints and coats the sheets, dries the coatings and then restacks the sheets. The coated sheets are the final product. The site also makes can ends from the sheet metal. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week and fifty-two (52) weeks per year. The facility consists of a cutting area, a coating area with four sheet coaters, four ovens, and three incinerators, and an end press area with five end stampers.

Emissions Summary

The following table lists the emissions changes associated with this permitting action. These data were transcribed from Attachment N of the application.

Potential Emissions	VOC (tpy)	HAP (tpy)
Existing Controlled	276.46	23.53 ⁽¹⁾
Change under MM01	-134.07	-7.47
Proposed Controlled	142.39	16.06

(1) *The PTE of HAP is an aggregate value. The facility is not permitted to have the potential to emit more than 10 tpy of a single HAP (cf. permit condition 4.1.10.).*

Emissions of PM, CO, SO₂, and NO_x are not affected by the proposed changes.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility has the potential to emit 142.39 tpy of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Impress USA, Inc., is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Permits for Construction/Modification of Stationary Sources
	45CSR30	Operating permit requirement.
State Only:	45CSR4	No objectionable odors

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2410C	October 10, 2008	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

This modification incorporates into the Title V permit the changes approved in underlying permit R13-2410C. The changes are described below.

1. U.S. EPA Method 204 Permanent Total Enclosures

The permittee performed capture and destruction efficiency testing during the period of October 2-4, 2007. The testing confirmed that the enclosures on all four (4) lines (Em. Unit IDs 1S, 2S, 17S, and 18S) meet the criteria of U.S. EPA Method 204 in Appendix M of 40 C.F.R. Part 51. As a permanent total enclosure (PTE), these enclosures may be assumed to have 100% capture efficiency. The increase in capture efficiency directly affects the minimum VOC capture efficiency in conditions 4.1.6., 6.3.1., 7.3.1., and 8.3.1. Since higher capture efficiency may now be assumed, and will be required by the proposed permit, the hourly and aggregate annual VOC emission limits for each of the production lines have decreased in condition 4.1.9.

2. Thermal Oxidizer 3C Combustion Chamber Temperature Decrease

Thermal oxidizer 3C controls VOC and HAP emissions generated by Coater Line No. 4 (Em. Unit ID 18S). The current permit requires the temperature of the combustion chamber of thermal oxidizer 3C be a minimum of 1,400°F when the oxidizer is processing VOCs/HAPs, and that a VOC control efficiency of 99% be achieved (4.1.6.). Stack testing conducted on October 3, 2007, demonstrated that 99.98% destruction efficiency was achieved with an average combustion chamber temperature of 1,390°F. Based upon these test results, the permittee requests a decrease in the required minimum operating temperature. The temperature decrease affects permit conditions 5.1.3., 8.4.3., and 8.7.

3. Update List of Coatings Used and Associated HAPs

The permittee requested that four (4) coatings and respective usage rates be added to the table in permit condition 4.1.7. Two (2) of the requested coatings were submitted to DAQ since they contain HAPs not listed in permit condition 4.1.8. In particular, coating 9851589 contains hexane, while coating 92X111H contains methanol and methyl carbitol. Therefore, the permittee has requested the addition of these three HAPs to the table in condition 4.1.8.

4. Reinstate Emission Points 6E and 7E

Emission points 6E and 7E on Oven Coater Line No. 2 (Em. Unit ID# 2S) were removed from previous applications as the permittee thought that the emissions from Thermal Oxidizer No.1 (Control Device ID# 1C) vented through emission points 4E and 5E which are located over Oven Coater Line 1 (Em. Unit ID# 1S). The permittee stated in this application that the emissions from Oven Coater Lines 1 and 2 are combined. However, both coater lines have two (2) stacks each. Therefore, the permittee requests reinstating 6E and 7E in order to capture and identify them in the permit.

5. Permit Structure Alteration

In keeping with recent alterations of Title V permit structure, section 1.0 of the current permit was modified such that there will be two subsections. Subsection 1.1 will be the Emission Units table, and subsection 1.2 will list the current version of underlying permits. Hence, citations of authority containing R13-2410B have the alphabetic suffix stricken throughout the proposed Title V permit. The table of contents will be modified for the new subsections.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not Applicable for minor modifications.
Ending Date: Not Applicable

All written comments should be addressed to the following individual and office:

Denton B. McDerment, P.E.
Title V Permit Engineer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Denton B. McDerment, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0476

Response to Comments (Statement of Basis)

No comments were received from U.S. EPA. Public comment does not apply to minor modifications. However, the permittee commented on the revised underlying permit R13-2410C during its draft period. The writer of that permit made changes in the final permit R13-2410C, which cause the following changes in the final Title V permit:

Title V Condition 4.1.7. – Added a note at the end of the table.

Title V Condition 4.3.2. – Added the last sentence regarding when VOC testing was last performed.

Title V Condition 5.1.3. – Added a superscript in the table, and the corresponding note following the table.

This writer also noticed that the total (last row of table) in condition 4.1.7. was inadvertently not updated in the proposed Title V permit. It has been updated in the final permit.